

# **EXHIBIT X**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES, INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

Case No. 17-CV-00454-GKF-JFJ

**DEFENDANTS' AMENDED OBJECTIONS AND RESPONSES TO  
PLAINTIFF'S FIRST INTERROGATORIES TO DEFENDANTS**

Defendants, Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill" or "Defendants") provide these amended objections and responses to Plaintiff Video Gaming Technologies, Inc.'s ("VGT" or "Plaintiff") first set of interrogatories to Castle Hill (the "Interrogatories").

**OBJECTIONS TO DEFINITIONS**

Defendants object to the following Definitions:

1. Defendants object to the definition of "Accused Games" with reference to games alleged in the Complaint to infringe because the Complaint fails to specifically identify which games allegedly infringe VGT's intellectual property rights. Defendants' responses will be limited to those game titles specifically enumerated in the definition.

2. Defendants object to the definition of "Award Sound Trade Dress Feature" because the Complaint fails to specifically describe which specific sounds of Plaintiff's machines are purportedly subject to trade dress protection and have allegedly been infringed, and what specific conduct by Castle Hill constitutes the alleged infringement.

13. Describe all information, Documents, and Things in Your possession, custody, or control that (a) any Former VGT Employee brought from VGT to CHG, (b) were created by or at VGT, or (c) are the property of VGT.

**Response:** CHG is unaware of any documents in its possession, custody or control that are responsive to this request.

Respectfully submitted,

Robert C. Gill

Robert C. Gill (admitted *pro hac vice*)  
Thomas S. Schaufelberger (admitted *pro hac vice*)  
Matthew J. Antonelli (admitted *pro hac vice*)  
SAUL EWING ARNSTEIN & LEHR, LLP  
1919 Pennsylvania Avenue, NW, Suite 550  
Washington, D.C. 20006  
(202) 295-6605  
(202) 295-6705 (facsimile)  
robert.gill@saul.com  
tschauf@saul.com  
matt.antonelli@saul.com

Sherry H. Flax (admitted *pro hac vice*)  
SAUL EWING ARNSTEIN & LEHR, LLP  
500 E. Pratt Street, Suite 900  
Baltimore, Maryland 21202  
(410) 332-8764  
(410) 332-8785 (facsimile)  
sherry.flax@saul.com

James C. Hodges, OBA #4254  
JAMES C. HODGES, P.C.  
2622 East 21st Street, Suite 4  
Tulsa, Oklahoma 74114  
(918) 779-7078  
(918) 770-9779 (facsimile)  
JHodges@HodgesLC.com

*Counsel for Defendants*

VERIFICATION

I, Jason T Sprinkle, in affiliation with Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC ("Castle Hill"), am duly authorized by Castle Hill to execute these Objections and Answers to Plaintiff's Interrogatories on its behalf. I have read the foregoing Answers and know the contents thereof. These Answers were prepared with the assistance and advice of counsel, upon whose advice I have relied. The Answers set forth herein, subject to inadvertent or undiscovered errors, are based on and therefore necessarily limited by the records and information still in existence, presently recollected and thus far discovered in the course of the preparation of these Answers. Castle Hill and I reserve the right to make any changes in these Answers if it appears at any time that omissions or errors have been made therein, or that more accurate information is available. Subject to the limitations set forth herein, I solemnly affirm under the penalties of perjury that the foregoing Answers to Plaintiff's First Set of Interrogatories are true to the best of my knowledge, information, and belief.

Signature:

Jason T Sprinkle

Printed Name:

Jason T Sprinkle

Title: Chief Operating Officer

Executed this 5 day of February, 2018.